

EXHIBIT 69

1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF MICHIGAN
3 SOUTHERN DIVISION

4 _____
5)
6) Civil Action No.
7) 5:16-cv-10444-JEL-MKM
8 In re: FLINT WATER CASES) (consolidated)
9)
10) Hon. Judith E. Levy
11) Mag. Mona K. Majzoub
12 _____)

13
14 Thursday, June 25, 2020

15 HIGHLY CONFIDENTIAL

16 VOLUME I

17 Remote videotaped deposition of
18 RICHARD D. SNYDER conducted at the location of the
19 witness in Ann Arbor, Michigan, commencing at
20 9:01 a.m., on the above date, before Carol A. Kirk,
21 Registered Merit Reporter, Certified Shorthand
22 Reporter, and Notary Public.

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8 Also Present:

9 Francis X. Ferrara, Veolia

 Udolilim Nnamdi, Cohen Milstein

10 Melissa Mays, Plaintiff

 Jazmine Duran, Videographer

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1 to implement, to address the TTHM issues, and
2 the residents will likely still find faults when
3 comparing to DWSD and blame unrelated issues
4 like plumbing caused by red water to the Flint
5 River.

6 And here's the part where I want
7 you to focus in on. "It seems that reconnecting
8 to the DWSD for the next two years will be the
9 best solution to satisfy the residents and
10 activists. The emergency manager and mayor may
11 not like it for political (mostly) and financial
12 reasons. They should not have unrealistic and
13 false hopes either."

14 Did I read that correctly, sir?

15 A. It appears so.

16 Q. You've already described to both
17 Mr. Leopold and to me that when it came to
18 Marc Edwards, once you had the evidence to
19 support his findings, you were willing to act
20 upon them, right?

21 A. That's correct.

22 Q. When it came to Dr. Mona
23 Hanna-Attisha, once you had the evidence to
24 support her findings, you were ready and willing

1 to act upon them, right?

2 A. Well, they supported one another,
3 Dr. Edwards and Dr. Mona.

4 Q. And, ultimately, once you had some
5 clarity and belief that Miguel Del Toral's
6 assessment and opinions had credibility, you
7 sprinkled that into the sauce that you were
8 making in terms of considering what to do best
9 about Flint as well, correct?

10 A. That was actually after the fact.

11 MR. CAMPBELL: Objection.

12 A. I'd already -- we had already
13 moved ahead, but it helped reaffirm.

14 Q. Okay. And so is it fair to say
15 that if a water quality -- a company that had an
16 expertise in water quality would have ever
17 gotten a message to the governor's office that
18 reconnecting to DWSD for the next two years was
19 the best solution, if there were facts to
20 support that conclusion, is it fair to say that
21 you would have considered those facts and
22 considered taking action?

23 MR. CAMPBELL: Object to the form.

24 A. I think that's an accurate

1 statement.

2 Q. Sitting here today, do you
3 remember anyone ever from Veolia trying to get
4 in touch with you directly or anyone in your
5 office to say, "The best solution for the folks
6 in Flint is to switch back to DWSD"?

7 MR. CAMPBELL: Object to the form.

8 A. I don't recall anything along
9 those lines.

10 Q. And you actually testified very
11 early this morning -- when Mr. Leopold was
12 talking about leadership and how you define it
13 and all of those things, you talked a little bit
14 about having an open door, about allowing people
15 to express their opinions.

16 If somebody from Veolia had
17 approached anyone on your staff who you trusted
18 and the folks on your staff who you trusted came
19 to you and said, "Governor Snyder, you need to
20 hear this," I take it you would have listened?

21 MR. CAMPBELL: Object to the form.

22 A. I would hope so. That would be
23 what I would expect.

24 - - -

1 (Snyder Deposition Exhibit 34 marked.)

2 - - -

3 BY MR. STERN:

4 Q. I want to show you now what I'd
5 like to mark as Exhibit 34. And this is going
6 to -- you're going to get a little annoyed with
7 me, because I'm going to show you a couple of
8 documents in a row that very much look the same.
9 But once we get through the third document,
10 you'll see why, and you'll understand why I'm
11 asking you these questions.

12 This was previously marked as
13 Walling Deposition Exhibit 32. So Mr. Walling,
14 the former mayor, had the opportunity to look at
15 this and testify to it as well.

16 And I'll represent to you again,
17 Governor Snyder, that you are not copied on this
18 e-mail. You are not referenced in this e-mail.
19 And as far as I know, you've not seen this
20 e-mail.

21 I'm going to start out here at the
22 bottom. And it's an e-mail from a woman named
23 Sarah Schuch, and she as an MLive.com e-mail
24 address. I'm sure as the two-term governor of